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Fund 2016, LLC*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

SCOTT A. CORRIDAN,

Debtor.

Case No.: 22-50366-nmc
Chapter: 11

**STIPULATION PURSUANT TO 11 U.S.C.
362 FOR RELIEF FROM AUTOMATIC
STAY WITH RESPECT TO REAL
PROPERTY LOCATED AT
100 REED CT., SAINT HELENA,
CALIFORNIA**

TO THE HONORABLE NATALIE M. COX, UNITED STATES BANKRUPTCY JUDGE:

Debtor, Scott A. Corridan (“Debtor” or Corridan”) and Breckenridge Property Fund 2016, LLC (“Breckenridge”, together with Debtor, the “Parties”) hereby submit this stipulation (the “Stipulation”) pursuant to Bankruptcy Code section 362, for an order approving the Stipulation to vacate the automatic stay with respect to real property located at 100 Reed Ct., Saint Helena, California, 94574 (the “Property”), such that Breckenridge may proceed with enforcing its rights and interest in the Property. The Parties agree the Property is not part of the bankruptcy estate.

RECITALS

1. On November 1, 2017, a Deed of Trust for the Property was executed by Debtor (and his former spouse) was recorded in the Official Records of Napa County, CA as Instrument No. 2017-0024569.
2. Debtor's right, title, and interest in the Property was awarded to Debtor's former spouse in a divorce proceeding, with judgment entered on October 15, 2018. Accordingly, Debtor no longer had an interest in the Property.
3. The Property was sold at public auction pursuant to a Notice of Default and Election to Sell on June 1, 2022 (the "Foreclosure Sale"). Breckenridge was the highest bidder at the Foreclosure Sale.
4. Subsequent to the Foreclosure Sale, Debtor commenced the instant bankruptcy case by filing a Voluntary Petition (Chapter 11) on July 12, 2022.
5. Breckenridge received a Trustee's Deed Upon Sale (the "TDUS") , reflecting its ownership of the Property, which was recorded as Instrument No. 2022-0014204 in the Official Records of Napa County, California on July 20, 2022. A copy of the TDUS is attached hereto as **Exhibit A**.
6. Debtor disclaims any interest in the Property prior to the Foreclosure Sale and confirms that the Foreclosure Sale would extinguish any interest Debtor had in the Property.
7. The Property is not part of the bankruptcy estate.
8. The Parties agree that the automatic stay with respect to the Property can be vacated, subject to the approval of this Stipulation by the United States Bankruptcy Court presiding over this case.

STIPULATION

Accordingly, the Parties stipulate, and request that the Court enter an order approving, the following:

1. To the extent applicable, the Parties hereto agree that the automatic stay under Section 362 of the Bankruptcy Code with respect to the Property, Breckenridge, and Debtor is hereby vacated.
2. Nothing herein shall be construed as affecting the rights, remedies, claims, or defenses of Debtor, any creditor, or any party to this bankruptcy case.

3. A Proposed Order approving this Stipulation is attached hereto as **Exhibit B.**

IT IS SO STIPULATED

DATED this 23rd day of August, 2022.

DATED this 23rd day of August, 2022.

WEDGEWOOD, LLC

DARBY LAW PRACTICE, LTD.

/s/ Brandon Trout

/s/ Kevin A. Darby

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